

Hearing Date: June 8, 2009
Time: 1:30 p.m.
Objection Deadline: 12:00 p.m., June 8, 2009
Hearing Location: Syracuse, New York

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

In re:

THE ALBERT LINDLEY LEE MEMORIAL HOSPITAL
a/k/a A.L. LEE MEMORIAL HOSPITAL,

Case No. 09-30845
Chapter 11 Case

Debtor.

**NOTICE OF MOTION BY DEBTOR FOR ORDER
APPROVING KEY EMPLOYEE INCENTIVE PLAN**

PLEASE TAKE NOTICE that, upon the Order Reducing Time for Hearing to Consider Debtor's Motion for Order Approving Key Employee Incentive Program issued by the Court on June 4, 2009, and the Affidavit of Camille W. Hill, Esq., sworn to the 4th day of June, 2009 in support thereof, debtor The Albert Lindley Lee Memorial Hospital, a/k/a A.L. Lee Memorial Hospital, the debtor and debtor in possession in the above-captioned chapter 11 case (the "Debtor"), by and through its counsel, Bond, Schoeneck & King, PLLC, will move before the Honorable Margaret Cangilos-Ruiz, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Northern District of New York, United States Courthouse, 100 South Clinton Street, Syracuse, New York on the 8th day of June, 2009 at 1:30 in the afternoon of that day, or as soon thereafter as counsel may be heard, for an order pursuant to 11 U.S.C. §§ 105, 363(b) and 503 authorizing and approving a key employee incentive plan, and granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE, that all affidavits and memoranda in opposition to the relief requested, if any, shall be in writing and shall be filed with the Clerk's Office, United States Bankruptcy Court for the Northern District of New York (Syracuse Division) and served upon the undersigned counsel for the Debtor no later than 12:00 p.m. on June 8, 2009.

Dated: June 4, 2009
Syracuse, New York

Respectfully Submitted,

BOND, SCHOENECK & KING, PLLC

By:



Stephen A. Donato, Esq., of counsel
Bar Roll No. 101522
Camille W. Hill, Esq., of counsel
Bar Roll No. 501876
Attorneys for debtor and debtor in possession
The Albert Lindley Lee Memorial Hospital
a/k/a A.L. Lee Memorial Hospital
Office and Post Office Address:
One Lincoln Center
Syracuse, New York 13202
Tel: (315) 218-8000
Fax: (315) 218-8100

TO: Guy A. Van Baalen, Esq.
Office of the United States Trustee
105 U.S. Courthouse
10 Broad Street
Utica, New York 13501

Robert M. Hirsh, Esq.
Arent Fox LLP
Counsel for the Official Committee of Unsecured Creditors
1675 Broadway
New York, New York 10019-5820

Lee E. Woodard, Esq.
Harris Beach PLLC
Counsel for Fulton Savings Bank
and Oswego Hospital
300 South State Street, 4th Floor
Syracuse, New York 13202

Nancy Hershey Lord, Esq.
Office of the New York State Attorney General
The Capitol
Albany, New York 12224-0341

All Essential Employees

All parties filing Notices of Appearance